

NO. X06-UWY-CV-18-6046436 S : SUPERIOR COURT
ERICA LAFFERTY, ET AL : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL : July 1, 2021

NO. X06-UWY-CV-18-6046437 S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
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MOTION FOR COMMISSION TO TAKE OUT OF STATE DEPOSITIONS

Pursuant to Conn. Gen. Stat. §52-148c(b) and Connecticut Practice Book §13-28(a), the plaintiffs in the above-captioned consolidated matters respectfully request that this Court grant a Commission to a competent authority, in the form attached hereto as Exhibit A., to issue or cause to issue Subpoena *Duces Tecum*, compelling the testimony and production of documents from Hillary Clinton, 15 Old House Lane, Chappaqua, New York.

THE WITNESS

Hillary Clinton is a former public official and a former presidential candidate. She has been the target of vitriolic criticism by Alex Jones.

Although Mr. Jones made certain statements about Sandy Hook as early 2012, and largely stopped making claims about Sandy Hook in the years thereafter, the plaintiffs in this action waited until 2018 to bring the instant action. They are all represented by the same firm, Koskoff, Koskoff and Bieder. On advice of counsel, at least one plaintiff has refused to answer how so many of the clients all ended up represented by the same firm. The witness claimed not to know how her legal fees were being paid.

It is clear as a matter of public record, that Erica Lafferty, the lead plaintiff in this case, was invited to speak at the Democratic National Convention in 2016. Ms. Lafferty was also praised thereafter by Hillary Clinton.

The defendants in this case believe that this suit was filed six years after the shootings at Sandy Hook as part of a vendetta inspired, orchestrated and directed in whole or in part by Hillary Clinton as part of a vendetta to silence Alex Jones after Ms. Clinton lost the presidential race to Donald J. Trump. The litigation is brought and pursued in bad faith as part of a partisan effort to silence Mr. Jones for reasons wholly independent of the merits of the plaintiffs' claims.

Someone directed all of the plaintiffs to the same firm many years after the shooting. The defendants are entitled to know who and why. The defendants intend to ask Ms. Clinton about her endorsement of Ms. Lafferty in 2016, the factors that led Ms. Lafferty to be invited to speak at the Democratic National Convention, and what role, if

any, Ms. Clinton or those working under her direction had in directing the plaintiffs to the same firm in this case. Ms. Lafferty is clearly a public figure in this case, and has inserted herself on to a public stage in order to advance her vision of what “gun safety” requires. The defendants seek to depose Ms. Clinton to gather further information about how it is that so many plaintiffs found themselves represented by the same firm so long after the events giving rise to the complaint, but shortly after Ms. Clinton suffered a deeply humiliating defeat in her run for the presidency in 2016.

THE DEFENDANTS
FREE SPEECH SYTSEMS, LLC
INFORWARS HEALTH LLC
PRISON PLANET TV LLC

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CERTIFICATION

This is to certify and a copy of the foregoing has been emailed and/or mailed, this 1st day of July 2021

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EXHIBIT A

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ORDER OF COMMISSION

The matter comes before the Court on the motion of the defendants in the above-captioned consolidated matters for leave or judicial authority and an issuance of an Order for Commission pursuant to the Connecticut Practice Book §13-28(a) for the taking of the deposition of Wolfgang Halbig.

IT IS HEREBY ORDERED, that the motion for issuance of an Order for Commission be allowed and is hereby granted: and, it is further ordered that any appropriate authority in the State of New York is authorized to issue a subpoena required to compel the attendance of the witness for the taking of said deposition and to produce requested documents:

Dated: this ____ day of July, 2021, at Waterbury, Connecticut

Hon. Barbara N. Bellis
Connecticut Superior Court